

WHISTLEBLOWING POLICIES AND PROCEDURE

1. Who is a Whistleblower?

1. A Whistleblower may be an employee or external party who, in the course of his/her duties or personal engagement with REDHILL has witnessed or who has knowledge that another employee or third party has previously engaged, is currently engaging or will be engaging in practices/activities that violate the ABC Policy. These breaches are highlighted to management with a view that further necessary preventative or corrective actions will be taken.
2. Whistleblowing is not a means by which anyone including a disgruntled employee can abuse, wreak revenge on or sabotage another person or fellow employee without just cause to hold an employee at ransom. Whistleblowing must be genuine and in good faith, with the utmost concern for REDHILL. It should not be unfounded or malicious allegations made against another employee.
3. A Whistleblower need not have to be directly or indirectly affected by or have a particular seniority or personal interest in the outcome of the actions. So long as an employee has a genuine concern and reasonable grounds to believe that REDHILL is being threatened by the ABC Policy being breached, they can be a Whistleblower.

2. Policies and Expectations

1. As employees are expected to abide by the principles of the ABC Policy and also maintain and demonstrate the highest professional standards and ethical conduct in the performance of their duties, they are encouraged to bring to the attention of management any violations and breaches of the ABC Policy and to raise any unethical or unlawful business conduct or dealings, with the intention for necessary corrective actions to be taken to address the violations.
2. A Whistleblower's identity and confidentiality will be maintained if requested (unless required by law to be otherwise).
3. Any retaliation towards a Whistleblower is unacceptable and will not be tolerated. Retaliation means any act of discrimination, reprisal, harassment, or vengeance recommended, threatened, or taken against a Whistleblower by other staff members because the Whistleblower has disclosed misconduct.

4. All disclosures made by a Whistleblower will be treated fairly and consistently. Where no actual evidence is available, so long as the issues and concerns are raised in good faith, investigations may be started if deemed appropriate.

3. Whistleblowing Procedure

1. Complaints of breaches and whistleblowing may be made by written email to the relevant BUH, President, CEO, or compliance@redhill.asia copying the HR department.
2. Where a conflict of interest may arise, or there are particularly sensitive scenarios, complaints and whistleblowing may be raised directly to the President or the CEO alone.
3. Any supporting or available evidence is to be submitted at the same time as making the report, or within a reasonable time of doing so under the given circumstances. Where necessary, the Whistleblower must be prepared to testify or provide a statement of the actions or breaches that are the subject matter of the complaint or report.
4. Reports and complaints will be acknowledged formally by the receiving party. After due consideration, and if deemed appropriate after weighing all the considerations, investigations will commence if the report is considered to be made in good faith (namely, a sincere belief that the disclosure is true), and if there is sufficient evidence and cause.

Where possible (bearing in mind, for example, the need to balance the interests of the party against whom the allegations are raised), the Whistleblower will be kept updated on whether the matter will be pursued or not. (Note that where a report is made anonymously- acknowledgement and updates will not be possible).